

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
CASE NO: 4:24-CV-00165

M.B., by and through)	
her parents and guardians,)	
D.B. and R.B.,)	
Plaintiffs,)	
))	
v.))	
))	
TRIANGLE MATH AND SCIENCE))	
ACADEMY BOARD OF DIRECTORS,))	
BUNYAMIN KARADUMAN, ERAY))	MOTION FOR LEAVE
IDILL, JENNIFER GREENE,))	TO PROCEED USING
TIMOTHY SCRANTON,))	PSEUDONYMS
EBONI MAYNARD, JOANNA BETTS,))	
BRANDIE HELMER, LATRESA))	
GRANTHAM, GREG CARPENTER,))	
MIHAELA RAYNOR, NORA CATES,))	
MEREDITH PFIFFER,))	
Defendants.))	

Plaintiffs, M.B., by and through her parents, D.B. and R.B., and the undersigned counsel, respectfully request that this Court grant Plaintiff leave to proceed under a pseudonym, specifically, his initials. M.B. is a minor and was a minor at all times relevant to the Complaint. M.B. would be readily identifiable if D.B. or R.B. were required to use their legal names, and thus Plaintiffs request leave to proceed using a pseudonym, also their initials, for M.B.'s parents.

Plaintiffs request this remedy to prevent disclosure both as a student, pursuant to the Family Educational Rights and Privacy Act of 1974 ("FERPA") and as the victim of disability-based discrimination. Disclosure of M.B., D.B. and/or R.B.'s legal names would cause irreparable harm for M.B. including *inter alia* the loss of her privacy rights.

Plaintiffs will disclose the identity of M.B., D.B. and/or R.B.'s to Defendants and Defendants' counsel once identified. Therefore, no prejudice will be suffered by any party if the Court grants this motion.

Respectfully submitted.

This is the 21st day of November, 2024.

/s/ Neubia L. Harris
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